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Before the  
Federal Communications Commission  
Washington, DC 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )

Amendment of Section 73.202(b), )

Table of Allotments, )

FM Broadcast Stations )

(Ardmore, Brilliant, Gadsden, Moundville, )

Pleasant Grove, Scottsboro, Trussville, )

Tuscaloosa and Winfield, Alabama, Columbus )

And Okolona, Mississippi, McMinnville, )

Pulaski and Walden, Tennessee) )

MM Docket No. 01-62 /  
RM-10053

To: Chief, Allocations Branch

COMMENTS AND COUNTERPROPOSAL OF STG MEDIA, LLC

STG Media, LLC ("STG Media") pursuant to Section 1.420 of the Commission's Rules and by its attorneys, hereby files its Comments in this rulemaking proceeding.<sup>1</sup> The Commission should allocate Channel 278A to New Hope, Alabama as that community's first local service instead of substituting Channel 278A for Channel 252A at Scottsboro, Alabama and modifying the authorization for WKEA(FM) (Scottsboro) accordingly. In support thereof, the following is respectfully submitted.

On October 6, 2000, Capstar TX Limited Partnership and Jacor Licensee of Louisville II, Inc. filed a petition for rule making to amend Section 73.202(b) of the Commission's Rules, proposing changes to the communities of license for various radio stations in the states of Alabama, Mississippi and Tennessee ("Capstar Petition"). The Capstar Petition includes a proposal to substitute Channel 278A for Channel 252A at Scottsboro and modify the

<sup>1</sup> The Notice of Proposed Rule Making in this proceeding authorizes the filing of Comments by April 24, 2001. See *Ardmore, Alabama* DA 01-563 (Chief, Allocations Branch) (released March 2, 2001) (the "NPRM"). Thus, these Comments are timely filed.

authorization for WKEA(FM) accordingly. The channel substitution for Scottsboro is possible because the Capstar Petition proposes the reallocation of Channel 279C1 from Gadsden, Alabama to Trussville, Alabama. The proposed channel substitution for Scottsboro permits the substitution and reallocation of Channel 252A at Pulaski, Tennessee to Channel 252C1 at Ardmore, Alabama and the modification of the authorization for WКСR(FM) (Pulaski) accordingly. On March 2, 2001, the Commission issued the *NPRM* and invited comments from the public.

STG Media files these comments to propose that the Commission allocate Channel 278A to New Hope, Alabama as that community's first local service instead of substituting Channel 278A for the existing channel for WKEA(FM). The allocation of Channel 278A to New Hope represents a preferential arrangement of the FM Table of Allotments<sup>2</sup> because it will permit the provision of a first local service to a community with more than 2,248 people.<sup>3</sup> The Capstar Petition, on the other hand, provides a first local service to Ardmore, a community with 1,090 persons, significantly smaller than New Hope.<sup>4</sup> Thus, New Hope is the preferred community for allotment purposes.<sup>5</sup>

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<sup>2</sup> See *Revision of FM Assignment Policies and Procedures*, 90 FCC 2d (1988). The FM allotment priorities are: (1) First fulltime aural service; (2) Second fulltime aural service; (3) First local service; and (4) Other public interest matters. Co-equal weight is given to Priorities (2) and (3).

<sup>3</sup> See *Engineering Statement of Jefferson G. Brock* attached hereto as Exhibit A.

<sup>4</sup> Inasmuch as the Capstar Petition proposes additional changes to the FM Table of Allotments, those changes are not relative to the comparative consideration of this counterproposal because those changes will occur regardless of whether Channel 278 is allocated to New Hope or Scottsboro. Thus, any comparative analysis of the STG Media counterproposal and the Capstar Petition is limited to a comparison of the proposals for New Hope and Ardmore as a first local service.

<sup>5</sup> See *Alva, Mooreland, Tishomingo, Tuttle, and Woodward, Oklahoma*, 2000 FCC LEXIS 6810 (released December 22, 2000) (determining factor in comparing competing proposals for a first local aural service is the size of the community of license) (citing *Sparta and Buckhead, Georgia*, DA 00-2481 (released November 3, 2000) and *Marks and Woodville, Florida*, 12 FCC Rcd 11957 (1997)).

New Hope qualifies as a community for allotment purposes. The town is incorporated and listed in the U.S. Census. New Hope has its own Post Office.<sup>6</sup> The city provides numerous services to its citizens, including a local public library, fire department, police department and rescue squad. The city has its own mayor and town council as the governing body. There are eleven churches located in New Hope, including the First Baptist Church of New Hope, the New Hope Church of Christ, the New Hope Church of God, and the New Hope United Methodist Church. New Hope has its own schools, including an elementary school and New Hope High School. The town has a clinic, restaurants, car dealers, insurance agencies, legal and medical professionals, a health club, and the New Hope Pharmacy. New Hope has its own telephone service, the New Hope Telephone Cooperative and its own telephone book.<sup>7</sup> New Hope therefore qualifies as a community for allotment purposes.<sup>8</sup>

STG Media hereby states that upon adoption of a Report and Order modifying the FM Table of Allotments and the opening of a new auction proceeding for the allotment to New Hope, STG Media will promptly file and participate in the auction for the new station. In the event STG Media is successful in the auction, STG Media will promptly file an application for construction permit for the new facility. STG Media further states that upon the grant of the construction permit for the new facility for New Hope, STG Media will construct the facility and commence operation promptly.

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<sup>6</sup> The zip code for the Post Office is 35760.

<sup>7</sup> Evidence that New is a community can be found in the information attached hereto as Exhibit B and the Declaration of Steven J. Shelton attached hereto as Exhibit C.

<sup>8</sup> See *Dillsboro and Rosman, North Carolina*, DA 00-2424 (Chief, Allocations Branch) (October 27, 2000).

### Conclusion

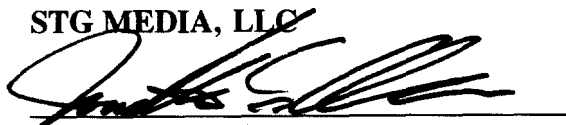
The STG Media counterproposal is superior to the Capstar Petition because it will permit the provision of a first local service to New Hope, a larger community than Ardmore. New Hope qualifies as a community for allotment purposes. Consistent with Commission precedent, the allotment of Channel 278A to New Hope as its first local service is preferable to the mere substitution of that channel for an existing station in Scottsboro.

WHEREFORE, for the foregoing reasons, the Commission should grant the STG Media counterproposal and amend the FM Table of Allotments accordingly:

<u>City</u>	<u>Channel</u>	
	<u>Present</u>	<u>Proposed</u>
New Hope, Alabama	-----	278A
Scottsboro, Alabama	252A	252A
Ardmore, Alabama	-----	-----
Pulaski, Tennessee	252A	252A <sup>9</sup>

Respectfully submitted,

STG MEDIA, LLC



David G. O'Neil  
Jonathan E. Allen  
Rini, Coran & Lancellotta, P.C.  
1350 Connecticut Avenue, NW  
Suite 900  
Washington, DC 20036  
(202) 296-2007

April 24, 2001

Its Attorneys

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<sup>9</sup> This counterproposal does not propose any other changes to the Capstar Petition. For the sake of brevity, STG Media is listing only those communities subject to the instant counterproposal.

**EXHIBIT A**  
**ENGINEERING STATEMENT OF JEFFERSON G. BROCK**

# GRAHAM BROCK, INC.

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BROADCAST TECHNICAL CONSULTANTS

**COUNTERPROPOSAL IN MM DOCKET #01-62**

**STG MEDIA, LLC**

**ALLOT CHANNEL 278A**

**NEW HOPE, ALABAMA**

**April 2001**

**TECHNICAL EXHIBIT**

*Copyright 2001*

**COUNTERPROPOSAL IN MM DOCKET #01-62**  
**STG MEDIA, LLC**  
**ALLOT CHANNEL 278A**  
**NEW HOPE, ALABAMA**  
**April 2001**

**TECHNICAL STATEMENT**

1. This technical statement and attached exhibits were prepared on behalf of STG Media, LLC ("STG"), seeking an allotment of Channel 278A to New Hope, Alabama.<sup>1</sup> The allotment will provide New Hope with its first local transmission service.

**DISCUSSION**

2. The town of New Hope, Alabama, is located in the southeastern portion of Madison County, Alabama.<sup>2</sup> New Hope is a municipality with a population of 2,248 persons.<sup>3</sup> New Hope presently has no licensed AM or FM facilities. The allocation of Channel 278A would, therefore, provide the community with its first local transmission service. New Hope is governed by a Mayor and five member Town Council, and provides its citizens with Police, Fire and water/sewer services, as well as a public school system.<sup>4</sup>

**REQUEST**

3. Channel 278A can be allotted to New Hope, Alabama, with a site restriction of 4.2 kilometers north of the community to avoid shortspacing the proposed addition of Channel

- 
- 1) The allotment of Channel 278A at New Hope, Alabama, is mutually exclusive with the allotment of Channel 278A at Scottsboro, Alabama, as proposed in MM Docket #01-62.
  - 2) According to 1990 Census data, the town of New Hope is not in the Huntsville, Alabama, urbanized area.
  - 3) 1990 Census data, U.S. Census of Alabama 1990 CPH-2-2
  - 4) Data obtained from the City Offices of New Hope, Alabama.

279C1 at Trussville, Alabama. Channel 278A can be allotted at geographic coordinates North Latitude 34° 34' 50" and West Longitude 86° 25' 17". Exhibit #1 is a map which visually demonstrates where a transmitter site for Channel 278A can be located to provide the requisite city grade coverage to New Hope. Exhibit #2 is a §73.207 spacing study which shows that from the proposed allocation site, Channel 278A meets the spacing requirements to all existing, applied for or proposed facilities.<sup>5</sup> From the reference site, a 3.16 mV/m contour will be placed over 100% of the town of New Hope.

4. Therefore, STG requests the following amendment to §73.202(b) of the rules:

**New Hope, Alabama**

Present  
None

Proposed  
278A

**PUBLIC INTEREST**

5. The allotment of Channel 278A to New Hope, Alabama, will provide the first local service to the community. A maximum Class A facility will deliver a 1.0 mV/m signal to 206,151 persons in 2,516.3 square kilometers.<sup>6</sup> When Channel 278A is allocated to New Hope, STG will file, on a timely basis, the appropriate expression of interest or an application for a construction permit, whichever is necessary, seeking authority to construct a new FM facility at New Hope, Alabama.

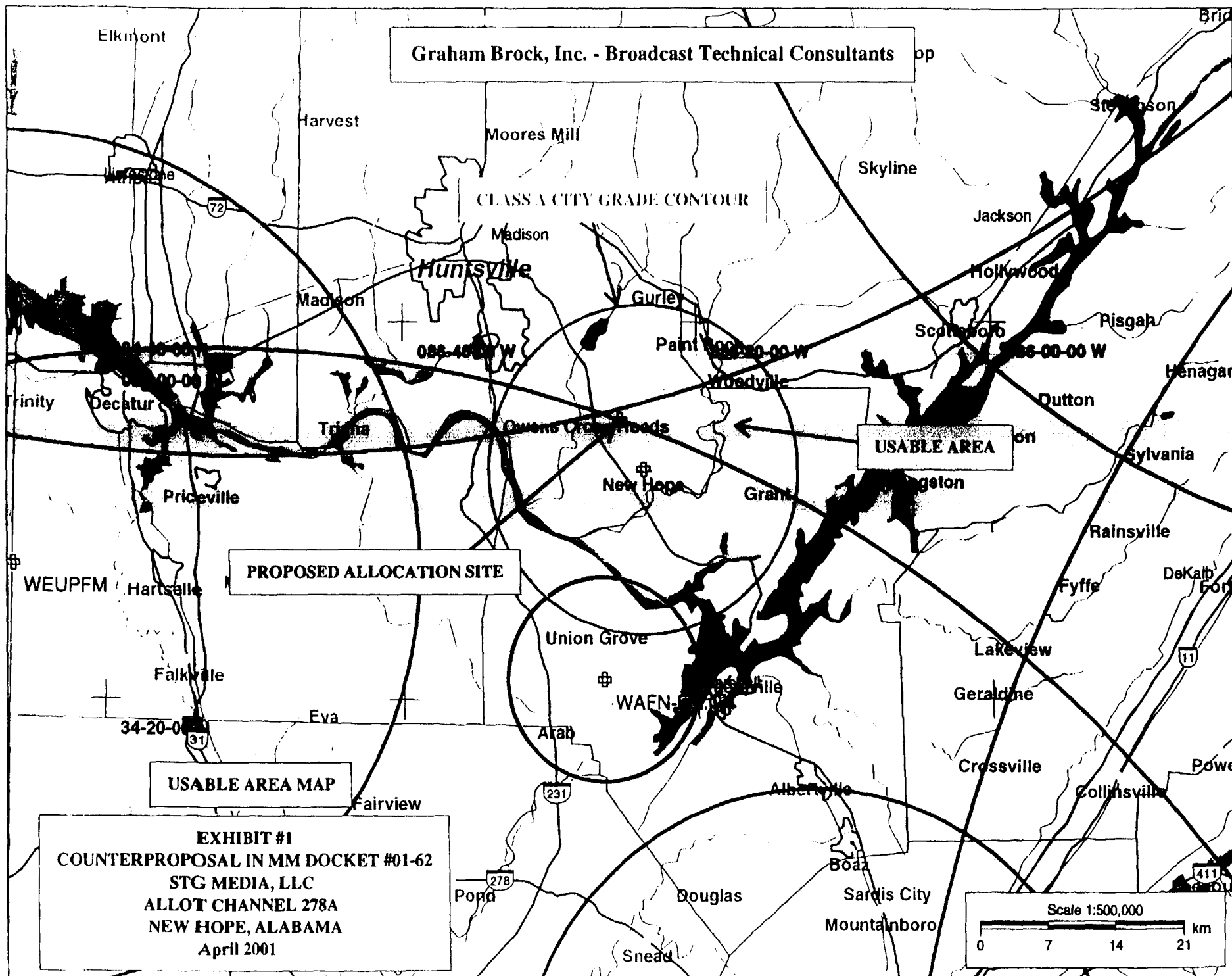
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5) Based on the re-allotment of Channel 279C1 from Gadsden, Alabama, to Trussville, Alabama, this proposal is mutually exclusive with the proposed Channel 278A allotment at Scottsboro, Alabama, and, as such, is not considered.

6) Population data extracted from 2000 Census data. Coverage is based on uniform coverage of a Class A facility with a service radius of 28.3 kilometers.



\*6. The foregoing Technical Statement was prepared on behalf of STG Media, LLC, by Graham Brock, Inc., its Technical Consultant. All information relating to the FM allocations and facilities was extracted from the CDBS database as updated on April 20,2001. We assume no liability for errors or omissions in that database which may be adverse to the requests contained herein.



**COUNTERPROPOSAL IN MM DOCKET #01-62**

**STG MEDIA, LLC**  
**ALLOT CHANNEL 278A**  
**NEW HOPE, ALABAMA**  
**April 2001**

**EXHIBIT #2**

**ALLOCATION STUDY FOR CHANNEL 278A AT NEW HOPE ALABAMA**  
**USING PROPOSED SITE AS REFERENCE**

REFERENCE			CLASS - A			DISPLAY DATES	
34 34 50 N			Current	Spacings		DATA	04-20-01
86 25 17 W			Channel 278 - 103.5 MHz			SEARCH	04-24-01
Call	Channel	Location	Dist	Azi	FCC	Margin	
N. Lat.	W. Lng.	Power	HAAT				
AD78	ADD 278A	New Hope	AL	0.0	0.0	115.00	-115.00
34 34 50	66 25 17	0.000 kW		0 M			
RADD	ADD 279C1	Trussville	AL	133.00	198.6	133.0	0.00
33 26 38	86 52 47	100.000 kW		299 M			
		RM-RAH10					
WKDF	LIC 277C	Nashville	TN	166.04	346.6	165.0	1.04
36 02 08	86 50 56	CN	100.000 kW	376 M			
	Citadel Broadcasting Co.	BLH-19820818AB					
WAFNFM CP	224A	Arab	AL	25.51	184.0	10.0	15.51
34 21 04	86 26 27	CN	6.000 kW	100 M			
	Fun Media Group, Inc.	BPH-20000809AAG					
WAFNFM APP	224A	Arab	AL	25.51	184.0	10.0	15.51
34 21 04	86 26 27	CX	1.700 kW	190 M			
	Fun Media Group, Inc.	BMPH-20001218ADE					
WAFNFM LIC	224A	Arab	AL	25.54	183.9	10.0	15.54
34 21 03	86 26 25	CN	0.800 kW	190 M			
	Fun Media Group, Inc.	BLH-19910424KD					
WEUPFM LIC	276C3	Moulton	AL	64.42	257.4	42.0	22.42
34 27 08	87 06 20	C	11.500 kW	150 M			
	Hundley Bates, Sr.	BLH-20000502AAP					
RADD	ADD 279C3	Walden	TN	120.81	52.2	89.0	31.81
35 14 32	85 22 17	25.000 kW		100 M			
		RM-RAH10					
WKXX	LIC 275A	Attalla	AL	70.08	163.6	31.0	39.08
33 58 28	86 12 24	CN	1.100 kW	214 M			
	Broadcast Media Llc	BLH-19910909KD					
WVEE	LIC 277C	Atlanta	GA	212.88	114.9	165.0	47.88
33 45 33	84 20 05	C	100.000 kW	310 M			
	Infinity Broadcast	BLH-20000920AAB					
WZPC.C CP	275C1	Shelbyville	TN	136.54	352.4	75.0	61.54
35 48 01	86 37 17	CN	100.000 kW	291 M			
	Wycq, Inc	BMPH19981208IE					
WZPC	LIC 275C1	Shelbyville	TN	136.54	352.4	75.0	61.54
35 48 01	86 37 17	CN	100.000 kW	247 M			
	Wycq, Inc	BLH-19890619KD					

**AFFIDAVIT AND QUALIFICATIONS OF CONSULTANT**

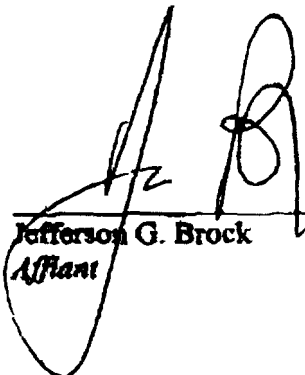
State of Georgia )  
St. Simons Island ) ss:  
County of Glynn )

**JEFFERSON G. BROCK**, being duly sworn, deposes and says that he is an officer of Graham Brock, Inc. Graham Brock has been engaged by STG Media, LLC, to prepare the attached Technical Exhibit.

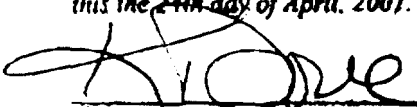
His qualifications are a matter of record before the Federal Communications Commission. He has been active in Broadcast Engineering since 1979.

The attached report was either prepared by him or under his direction and all material and exhibits attached hereto are believed to be true and correct.

This the 24th day of April, 2001.

  
Jefferson G. Brock  
Affiant

Sworn to and subscribed before me  
this the 24th day of April, 2001.

  
Notary Public, State of Georgia  
My Commission Expires: April 20, 2002



## **EXHIBIT B**

**U.S. Census Bureau****U.S. Gazetteer**

Select one of the following matches to your query to look at that place in the Tiger Map Browser or retrieve 1990 Census tables.

This is a searchable index. Enter search keywords:

- **New Hope Division, AL** (county subdivision)  
Population (1990): 11793  
Location: 34.55836 N, 86.43891 W  
Zip Code(s): 35747 35760 35763 35803  
Browse [Tiger Map](#) of area.  
Lookup 1990 Census [STF1A](#), [STF3A](#) tables.
- **New Hope, AL** (town)  
Population (1990): 2248  
Location: 34.53914 N, 86.41589 W  
Zip Code(s): 35760  
Browse [Tiger Map](#) of area.  
Lookup 1990 Census [STF1A](#), [STF3A](#) tables.

\*Note: This dataset is derived from the Census GICS and does not contain unincorporated place names. For other geographic entities, try searching the [USGS Geographic Names Information System](#). The [US Gazetteer Place and Zipcode files](#) used in this service is available for downloading.

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**5381 MAIN DR  
NEW HOPE AL 35760-9114**

is delivered by:

**UNITED STATES POSTAL SERVICE  
5464 MAIN DR  
NEW HOPE AL 35760-8608**

***Phone : 800-275-8777***

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(256) 723-2616

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<a href="#">First Baptist Church-New Hope</a>	231 Church Ave	New Hope, AL	(256) 723-4334
<a href="#">First Baptist Church-New Hope</a>	247 Church Ave	New Hope, AL	(256) 723-4614
<a href="#">Galilee Baptist Church</a>	4262 Old Highway 431	New Hope, AL	(256) 723-4819
<a href="#">Hebron Baptist Church</a>	32911 Highway 431 S	New Hope, AL	(256) 878-7524
<a href="#">Hebron United Methodist Church</a>	PO Box 420	New Hope, AL	(256) 723-4812
<a href="#">Mt Zion Baptist Church</a>	1300 Oak Grove Rd # A	New Hope, AL	(256) 723-2512
<a href="#">New Hope Church Of Christ</a>	238 College Ave	New Hope, AL	(256) 723-4421
<a href="#">New Hope Church Of God</a>	972 New Hope Rd	New Hope, AL	(256) 723-4918
<a href="#">New Hope United Methodist</a>	5351 Main Dr	New Hope, AL	(256) 723-4048
<a href="#">New Hope United Methodist Chr</a>	5351 Main Dr	New Hope, AL	(256) 723-4812
<a href="#">Walnut Grove Presbyterian Ch</a>	New Hope Rd	New Hope, AL	(256) 828-4838
<a href="#">Woodville Church Of God</a>	1891 Paint Rock Rd	New Hope, AL	(256) 723-2968

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<a href="#">New Hope High School</a>	5216 Main Dr	New Hope, AL	(256) 723-4226

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EXHIBIT C  
DECLARATION OF STEVEN J. SHELTON

04-21-2001 07:29 FAX 2000004410 STG MEDIA 4/001

DECLARATION OF STEVE J. SHELTON

I, Steven J. Shelton, hereby make the following declaration under the penalty of perjury:

I am a Managing Member in STG Media, LLC ("STG Media"). STG Media is filing comments and a counterproposal today in MM Docket No. 01-62. I have reviewed the pleading entitled "Comments and Counterproposal of STG Media" and to the best of my information, knowledge and belief, the facts stated therein are true, complete and accurate.

Signed this 24<sup>th</sup> day of April, 2001.

  
Steven J. Shelton



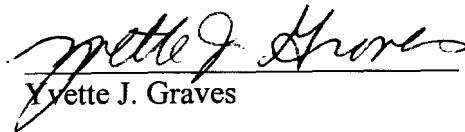
**Certificate of Service**

I, Yvette J. Graves, a secretary in the law firm of Rini, Coran & Lancellotta, P.C., do hereby certify that on this 24<sup>th</sup> day of April, 2001, I caused copies of the foregoing "Comments and Counterproposal of STG Media, LLC" to be placed in the U.S. Postal Service, first class postage prepaid, or hand delivered (as indicated below), addressed to the following persons:

\*John Karousos  
Allocations Branch  
Policy and Rules Division  
Mass Media Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Mark N. Lipp  
Shook, Hardy & Bacon  
600 14<sup>th</sup> Street, NW  
Suite 800  
Washington, DC 20005  
(counsel for Capstar TX Limited Partnership and  
Jacor Licensee of Louisville II, Inc.)

Gregory L. Masters  
Wiley, Rein & Fielding  
1776 K Street, NW  
Washington, DC 20006  
(counsel for Capstar TX Limited Partnership and  
Jacor Licensee of Louisville II, Inc.)

  
Yvette J. Graves

\* Hand Delivered